5

Filed

~~RECEIVED~~

2012 SEP 10 PM 5:06

M.L. HATCHER, CLK
U.S. BANKRUPTCY COURT
W.D. OF WA AT SEATTLE
BY ____________ DEP CLK.

Honorable Marc L. Barreca
Submitted for a hearing on July 20, 2012
Absent any motion scheduled to approve
"Proposed Order On Claims"

THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In Re ADAM R. GROSSMAN	NO. 10-19817 ADAM R. GROSSMAN'S OBJECTION TO PROPOSED ORDER ON CLAIMS (#3)

S/ADAM R. GROSSMAN/
5766 27TH AVE NE
SEATTLE, WA 98105
646-342-1994
BK@ADAMREEDGROSSMAN.COM

This claim is erroneously $30,000 and should correctly be $62,079.

No Caption – Analogous Wording To Docket #369

There is no caption on the upper right part of the first page because there was no hearing or motion to approve claims. Rather, the trustee's attorney submitted suggested "Order Allowing Claims" in Docket #368 absent any motion to approve claims for which a purported "Order Allowing Claims" would have been relevant.

Similar to docket entry #369 "Tsai Law Company's Objection To Proposed Order On Claims" (See Exhibit "1") which objects to a proposed order absent any motion to approve the order, I have similarly submitted this document, "Objection to Proposed Order On Claims."

Correct Amount Already Approved By The Court Should Be Used

The allocation of $30,000 to the Tsai Law Company PLLC for Chapter 11 administrative claims shown by the Trustee on Page 9 of the proposed order is not correct.

The Court has already found that fees, costs, and expenses in the amount of $62,079 (Docket No. 196) were "reasonable" and therefore ordered that they be "approved" provisionally. This seems to imply "provisionally" until such time that all other claims of equal priority can also be paid at 100%. That time is now thus the approval is no longer provisional. The correct amount already approved of $62,079 should be reflected in the claims.

The Tsai Law Company PLLC should be praised by the trustee

Emily Tsai, more than any other person, deserves the Nobel Prize in Protecting and Preserving the assets of the estate.

First, the trustee has complained about redacted parts of their billings but others have said that their billings were slightly understated; I do not wish to waive attorney-client privilege but to the extent possible, I concur with this statement made by others.

S/ADAM R. GROSSMAN/
5766 27TH AVE NE
SEATTLE, WA 98105
646-342-1994
BK@ADAMREEDGROSSMAN.COM

Second, Emily Tsai was the only person in the court room on November 15, 2010, who correctly understood bankruptcy law and the jurisdiction of the bankruptcy court when she started to address the court, "I just wanted to bring to the Court's attention the issue of the bankruptcy and the powers of the bankruptcy court" before being interrupted twice, resulting in an error of law propagated to today that the trustee recently stated would cost an additional $25,000 in litigation expenses to correct.

The Declaration "DECLARATION OF ADAM R. GROSSMAN VOLUME I OF X" dated August 28, 2012 is incorporated by reference.

Third, in November, 2010, two or more people, possibly three who received financial benefit paid by the same organization, agreed in advance to engage in or causing the performance of such conduct that included making false statements known to be false by the speaker(s) at the time they were made and omitting facts or suppressing information which, in light of the circumstances under which they were made, would be necessary to make the statements not misleading, or to employ a scheme or artifice or to engage in any act, practice, or course of conduct for the purpose, intent, and goal of knowingly and willfully misrepresenting to people, or failing to inform them, of material facts upon which they relied, directly or indirectly, in connection with the purchase of sale of securities offered by the Tanager Fund LP, regulated by the SEC and filed under Regulation D §504 and §505 exempt from registration but subject to the full force and powers pursuant to The Act, as amended, with restrictions set forth therein including the use of any means or instrumentality of interstate commerce, or of the U.S. Mail, or of electronic wires across state lines, for the ultimate goal of deceiving other people, defrauding investors, and taking the property belonging to one or more people. The Tsai Law Company consistently opposed this defrauding of investors.

S/ADAM R. GROSSMAN/
5766 27TH AVE NE
SEATTLE, WA 98105
646-342-1994
BK@ADAMREEDGROSSMAN.COM

Fourth, Jill Borodin directly and/or through her attorney falsely represented the ownership of property, assets or the equivalent value in the amounts of $255,000, $101,617, $281,619, $278,000, and $255,000 (again) and $215,000 which have been cited to justify the attempted, and twice successful fraudulent or unauthorized taking, of property belonging to other people, companies, or assets claimed by the bankruptcy estate.

Fifth, this included the removal post-petition; without prior approval of the bankruptcy court; absent notice, a motion, and a hearing; not while acting as debtor in possession; nor in the course of business; for no present consideration; and for no future consideration, assets claimed by the bankruptcy estate which have yet to be returned and for which liability to the estate for this unauthorized removal potentially still exists.

Sixth, only due to the efforts of the Tsai Law Company PLLC, is the estate not facing a deficit nearly $1m worse than it is now as the Tsai Law Firm steadfastly, and generally successfully, opposed the false and fraudulent representations that have defrauded investors and overstated assets in the estate.

Dated August 31, 2012, signed in Seattle, WA.

s/Adam R. Grossman/

Resubmitted and resigned

Dated September 10, 2012, signed in Seattle, WA.

s/Adam R. Grossman/

S/ADAM R. GROSSMAN/
5766 27TH AVE NE
SEATTLE, WA 98105
646-342-1994
BK@ADAMREEDGROSSMAN.COM

Exhibit "1"

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON, AT SEATTLE

In re ADAM GROSSMAN Debtor,	NO. 10-19817 TSAI LAW COMPANY'S OBJECTION TO PROPOSED ORDER ON CLAIMS

Special Counsel for Debtor Tsai Law Company PLLC, objects to the proposed Order Allowing Claims insofar as Tsai Law Company's Chapter 11 administrative claim amount is shown by the Trustee as $30,000 on page 9 of the proposed Order, when in actuality, the Court has approved Tsai Law Company's compensation request in the Chapter 11 proceeding in amount of $62,079 (Docket No. 196 attached). Tsai Law Company requests that the Order Allowing Claims accurately reflect the approved amount.

Dated this 13th of July, 2012

/s/John H. O'Rourke WSBA 21615
WSBA 21615 Attorney for Tsai Law Company

LAW OFFICE OF JOHN H. O'ROURKE
2101 FOURTH AVENUE, SUITE 1560
SEATTLE, WA 98121
(206) 824-2802

Case 10-19817-MLB Doc 369 Filed 07/13/12 Ent. 07/13/12 16:09:51 Pg. 1 of 4

S/ADAM R. GROSSMAN/
5766 27TH AVE NE
SEATTLE, WA 98105
646-342-1994
BK@ADAMREEDGROSSMAN.COM